

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

SECURITIES AND EXCHANGE COMMISSION,

Plaintiff,

v.

TERRAFORM LABS PTE LTD. and
DO HYEONG KWON,

Defendants.

No. 1:23-cv-1346 (JSR)

**NOTICE OF UNOPPOSED MOTION FOR ISSUANCE OF LETTERS
OF REQUEST FOR INTERNATIONAL JUDICIAL ASSISTANCE**

In accordance with ¶ 2 of Your Honor's Individual Rules of Practice, Plaintiff, the U.S. Securities and Exchange Commission ("SEC"), respectfully requests that this Court execute, under its seal and signature, letters of request for International Judicial Assistance under the Hague Convention on Taking of Evidence Abroad in Civil or Commercial Matters ("Hague Evidence Convention") to non-parties located in the Republic of Korea.

The SEC has conferred with Defendants, they do not oppose this motion, and Defendants' own requests are incorporated in the letters of request. The requests seek documents from:

Chai Corporation
3rd floor (Seongsu-dong 2-ga, JK Tower)
16, Seongsui-ro 20-gil, Seongdong-gu
Seoul, Korea

The requests also seek testimony from a former executive of Chai Corporation:

Mr. Hyun-Seong “Daniel” Shin
83-21 Wangsimni-ro, Seongdong-gu
A-dong 3003-ho (Acro Seoul Forest Apartment, Seongsudong 1-ka)
Seoul, Korea

For the reasons set forth in more detail in the accompanying Memorandum in support of this Motion, the SEC respectfully requests, without opposition from Defendants, that the Court grant this motion and execute the letters of requests attached to the Memorandum.

Dated: July 10, 2023

Respectfully submitted,

/s/ James P. Connor
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CERTIFICATE OF SERVICE

I hereby certify that on July 10, 2023, I filed the foregoing through the Court's CM/ECF system, which will send notifications of such filing to all counsel of record.

/s/ James P. Connor
James P. Connor